

**United States District Court  
District of Massachusetts**

**DOUGLAS G. GREER,**  
PLAINTIFF,

v.

**CIVIL ACTION NO. 05-30001-MAP**

**CITY OF SPRINGFIELD, JEFFREY M.  
ASHER, JAMES F KERVICK, JAMES L.  
SHEWCHUCK, JAMES M. MORIARTY,  
JOHN DOES Nos. 1-4, JOHN DOE, No. 5,  
and PAULA MEARA, CHIEF OF POLICE,  
DEFENDANTS.**

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**JOINT STATEMENT PURSUANT TO L.R. 16.1**

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Now come Plaintiff Douglas C. Greer and Defendants City of Springfield, Paula Meara, Jeffrey M. Asher, James F Kervick, James L. Shewchuck, and James M. Moriarty and state that they have conferred as required by court order and L.R. 16.1 and agree:

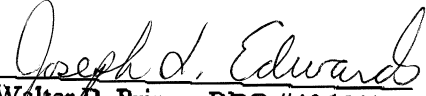
- 1) the plaintiff will make a written demand for settlement within 30 days and the defendants will respond by forty five days; and
- 2) they have conferred with their respective counsel as required by Local Rule 16.1 with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, of litigation and to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4. Plaintiff's certification as required by L.R. 16.1 (D)(3) is submitted herewith. Defendants will submit their certifications under separate cover.

In addition, the parties agree to an order for discovery and a proposed schedule for the filing of motions and pretrial scheduling as follows:

1. All automatic discovery will be exchanged by May 27, 2005;
2. All written discovery requests will be served July, 27, 2005;


3. Motions to amend pleadings to add parties, complying with Local Rule 15.1(B), (which requires a party seeking an amendment that would add a new party to serve the motion to amend on the proposed new party at least ten days prior to filing), before October 27, 2005;
4. All non-expert depositions before August 27, 2006;
5. Counsel will appear again before this court for a status conference thereafter.

<sup>G</sup>  
Douglas Z. Greer  
By His Attorneys

  
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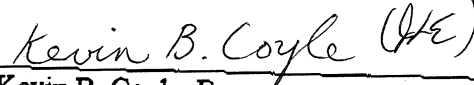
Respectfully submitted,

Defendants City of Springfield and Paula Meara  
By Their Attorney

  
Edward M. Pikula  
Associate City Solicitor  
BBO #399770  
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Defendants Jeffrey M. Asher, James F Kervick,  
James L. Shewchuck, and James M. Moriarty

By Their Attorney

  
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